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COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

) MM Docket No. 93-0786

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CONSOLIDATED REPLY COMMENTS

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February 13, 1996

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SUMMARY

Tyler Broadcasting Corporation ("TBC") submits its Reply Comments in the rule making proceeding concerning TBC's proposal to reallocate Channel 227C1 from Ada to Newcastle, Oklahoma. TBC replies to the pleadings filed by Ms. Vera L. Dunn ("Dunn") and Diamond Broadcasting, Inc. ("Diamond") opposing TBC's proposal.

TBC demonstrates that none of the arguments raised by Diamond support a denial of TBC's proposed reallocation. Diamond's arguments concerning the relative difference in the population of Newcastle versus the Oklahoma City Urbanized Area are not supported by Commission precedent. The most important factor in this case is the evidence that has been produced to demonstrate that Newcastle is a separate community from Oklahoma City. Commission precedent holds that this evidence is more pertinent on the issue of whether to award TBC a first local service preference for its proposed reallocation of Channel 227C1 to Newcastle.

Diamond incorrectly claims that Newcastle is contiguous to the Oklahoma City Urbanized Area. TBC produces evidence to show that Newcastle is physically separate from the boundaries of the Oklahoma City Urbanized Area.

Diamond fails to show that Newcastle is interdependent upon Oklahoma City. In fact, the evidence supplied by Diamond actually shows that Newcastle is an independent community.

The "Contingent Objection" filed by Ms. Dunn is procedurally flawed and should be stricken. Ms. Dunn filed her Objection pro se and did not provide the necessary

verification called for under the Rules. Should the Commission consider Ms. Dunn's Objection, TBC demonstrates that the Commission cannot grant the relief she seeks. TBC shows that it has pledged to reimburse Ms. Dunn the expenses associated with the channel change for her FM station and that it has done all that the Commission requires in this case.

Before the
Federal Communications Commission

Washington, D.C. 20554

In the Matter of) MM Docket No. 95-175
) RM-8707
Amendment of Section 73.202(b))
(Table of Allotments))
FM Broadcast Stations)
)
(Ada, Newcastle and Watonga, Oklahoma))

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FEB 13 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

TO: Chief, Allocations Branch
Policy and Rules Division

CONSOLIDATED REPLY COMMENTS

Tyler Broadcasting Corporation ("TBC"), by its attorneys, hereby submits its Consolidated Reply Comments in the above-captioned rule making proceeding. In support whereof, the following is shown:

Background

1. TBC is the licensee of KTLS(FM), Ada, Oklahoma. At the request of TBC, the Commission in its Notice of Proposed Rule Making, DA 95-2367, released December 6, 1995 ("NPRM"),¹ proposed to amend Section 73.202(b) of the Rules to (a) delete Channel 227C1 from Ada, Oklahoma; (b) add Channel 227C1 to Newcastle, Oklahoma; and (c) modify the license for KTLS(FM) to specify "Newcastle, Oklahoma" as the station's city of license. The Commission also proposed to substitute Channel 230A for

¹ The Commission's NPRM established February 13, 1996, as the deadline for filing reply comments in this proceeding. Therefore, these Consolidated Reply Comments are timely filed.

Channel 228A at Watonga, Oklahoma, and ordered the licensee of KIMY, Watonga, Oklahoma, to show cause why KIMY's license should not be modified to accommodate KTLS's move to Newcastle. TBC pledged to reimburse Ms. Vera L. Dunn, the licensee of KIMY, for her reasonable and prudent costs incurred in connection with making the channel change, under the principles of FM Table of Allotments (Circleville, Ohio), 8 FCC 2d 159 (1967).

2. The Commission's records reveal that only two parties filed pleadings on or before the comment deadline in this proceeding. Diamond Broadcasting, Inc. ("Diamond"), licensee of KOMA(AM), KOMA-FM, and KRXO(FM), Oklahoma City, filed its "Comments of Diamond Broadcasting, Inc." on January 29, 1996. Ms. Dunn filed pro se a "Contingent Objection" to TBC's rule making proposal on January 22, 1996. TBC now replies to those pleadings.

Comments of Diamond Broadcasting, Inc.²

3. Diamond argues that TBC's proposal to reallocate Channel 227C1 from Ada to Newcastle, Oklahoma, "does not warrant a first local service preference," but rather, should be treated as if it will bring another broadcast service to the Oklahoma City, Oklahoma urbanized area. Diamond has overlooked Commission precedent and ignored the overwhelming amount of documentary evidence that conclusively demonstrates that

² Diamond's Comments are procedurally defective. Section 1.415 of the Commission's Rules states that "interested parties" may file comments in a rule making proceeding. Diamond provides no statement as to its interest in this proceeding. Diamond's comments appear to be nothing more than an attempt to delay or impede FCC action on TBC's proposal and its Comments should be given little, if any, consideration.

Newcastle, is an independent community, separate in all possible respects from Oklahoma City.³

4. Without citing supporting precedent, Diamond argues that the difference in population between Oklahoma City and Newcastle (444,719 to 4,214) is so large that the Commission cannot find that TBC's proposal would provide first local service to Newcastle. However, difference in population is only one of three factors that the Commission examines when deciding whether to grant a first local service preference, or whether it should attribute all of the broadcast signals in an urbanized area to a petitioner's reallocation proposal. The Commission examines: (1) the population coverage to both communities; (2) the relative size of both communities and (3) the interdependence of the two communities. See, Faye & Richard Tuck, 3 FCC Rcd 5374 (1988). While factors (1) and (2) may weigh in favor of attributing all of the broadcast signals in an urbanized area, those factors are "pertinent but less significant" than the evidence adduced under factor (3) concerning interdependence. See, FM Table of Allotments (Bay St. Louis and Poplarville, MS), DA 95-2384, released December 6, 1995. Where there is strong evidence of independence of the two communities, the Commission will not

³ In support of its contention, Diamond rather curiously cites to the Commission's decision in FM Table of Allotments (Headland, Alabama and Chattahoochee, Florida), 10 FCC Rcd 10352 (1995), where the Commission made a reallocation to Headland, Alabama, where there was much stronger evidence of interdependence with Montgomery, Alabama, than exists in this case. Headland supports a grant of TBC's proposal. In the other case cited by Diamond, FM Table of Allotments (Sandy Springs, GA), 6 FCC Rcd 6580 (1991), the Commission denied a proposed reallocation because the evidence of interdependence between the two communities was very strong. In the Newcastle case, there is no evidence that Newcastle and Oklahoma City are interdependent.

attribute the broadcast signals in the urbanized area even if factors (1) and (2) would favor attribution.

5. TBC has presented overwhelming evidence that Newcastle is a community separate from Oklahoma City. Therefore, despite the population differences in this case, the evidence favors a finding that TBC's proposal will bring first local service to Newcastle. On at least three occasions, the Commission has granted proposed reallocations where the difference in population was between 3% and 5%. See, FM Table of Allotments (Bay St. Louis and Poplarville, MS), DA 95-2384, released December 6, 1995 (population difference of 179,643 to 8,063 or 4.48%); FM Table of Allotments (Scotland Neck and Pinetops, NC), 7 FCC Rcd 5113 (1992)(population difference of 48,997 to 1,515 or 3.08%); and FM Table of Allotments (D'Iberville and Wiggins, MS), 10 FCC Rcd 10796 (1995)(population difference of 179,643 to 6,566 or 3.66%). Therefore, even where the difference in population between the new community of license and the central city is relatively large, the Commission has awarded a first local service preference.

6. Diamond erroneously claims that Newcastle is outside but contiguous to the Oklahoma City Urbanized Area. The attached Technical Exhibit provides additional evidence to rebut Diamond's arguments.⁴ Exhibit 1 of the Technical Exhibit depicts the city limits of Newcastle and the Oklahoma City Urbanized Area. The city limits fall short

⁴ A facsimile copy of the Technical Exhibit is included as Exhibit 1. The original of the Technical Exhibit will be submitted upon receipt.

of the boundaries of the Oklahoma City Urbanized Area.⁵ Furthermore, there exists a natural boundary, the South Canadian River, that separates Newcastle from the boundary of the Urbanized Area.⁶ The fact that Newcastle is not only outside of the Oklahoma City Urbanized Area but is also physically separate from it is further evidence that Newcastle is a separate community. See, FM Table of Allotments (Parker and Port St. Joe, Florida), DA 95-2488, released January 30, 1996. At paragraph 5 of its NPRM, the Commission observed that if Channel 227C1 is allotted to Newcastle, station KTLS will provide 95 % of the Oklahoma City Urbanized Area with a 70 dBu signal. Exhibit 2 of the Technical Exhibit shows that the 70 dBu contour (3.16 mV/m) would cover 85 % of the Urbanized Area from the proposed allocation site. While more than 50 % of the Urbanized Area would be covered with a 70 dBu signal, it is important to note that the factual basis upon which the Commission based the additional interdependence study requirement in its NPRM (i.e., the novel 50 % urbanized area coverage policy) is somewhat flawed.⁷

⁵ Diamond acknowledges that Newcastle is located "15 miles south of Oklahoma City." Diamond Comments at p. 3.

⁶ The fact that a natural body of water lies between the new community of license and the central city was a factor in FM Table of Allotments (D'Iberville and Wiggins, MS), 10 FCC Rcd 10796 (1995) where the Commission granted a proposed reallocation finding that the new community of license and the central city were physically separated by water.

⁷ Petition restates that it believes that the Commission has erred in imposing this new requirement without proper notice and an opportunity for the public to comment. Therefore, TBC preserves herein its right to raise the issue of legality of this novel Commission action in any subsequent forum or proceeding.

7. Diamond included with Exhibit 2 of its Comments a copy of a promotional brochure provided by a local real estate office. Ironically, the brochure provides additional evidence that Newcastle is a community separate from Oklahoma City. As noted in the brochure, Newcastle and the surrounding "tri-city" area (Newcastle-Blanchard-Tuttle) are separate communities from Oklahoma City. The brochure relates that Newcastle has its own government, public safety services, water and sewerage facilities, businesses, schools and employers. Despite this additional evidence, Diamond continues to claim that Newcastle is not an independent community. Diamond rather disingenuously claims that Newcastle has no "major public hospital, telephone directory or public transportation system."⁸ While Newcastle does not have a hospital, it does have two health clinics, a dentist, two chiropractors, two veterinarians, two vision/eyeglass centers and a home health care service for elderly and indigent patients. (See TBC's Comments at p. 12 citing to Exhibit 4, the letter of Newcastle's City Manager, Allen Benelli.) Newcastle does have its own telephone directories as was demonstrated in TBC's Comments at pp. 11-12 and Exhibit 3, copies of the local phone directories.

⁸ The cases cited by Diamond are inapposite. In RKO General, Inc., 5 FCC Rcd 3222 (1990), the Commission denied a proposed allotment where the evidence presented under the eight factors was "mixed at best." In fact, the petitioner could not even show that the residents of the proposed community perceived themselves as citizens of a separate community. In the case of Newcastle, TBC has presented exhaustive evidence supporting the proposal under each of the Commission's factors, which shows that Newcastle is an independent community. Similarly, in the other case cited by Diamond, FM Table of Allotments (Bay City, TX, et al.), 10 FCC Rcd 3337 (1995), the Commission denied a proposed allotment to a new community located within an Urbanized Area which would have removed the old community's only FM service. In this case, Newcastle is not located within the Oklahoma City Urbanized Area and FM service will be retained at Ada, Oklahoma, with KADA-FM (Channel 244A).

Pioneer Telephone Cooperative and Southwestern Publishing, Inc., each publish a separate telephone directory that includes listings for Newcastle and other surrounding communities such as Blanchard and Tuttle. Oklahoma City listings are not included in these directories. In the phone listings printed by Southwestern Bell for the Oklahoma City area, Newcastle is given a separate section and its listings are not combined with the listings for Oklahoma City. Exhibit 2 attached hereto is a copy of a portion of Southwestern Bell's telephone directory for Oklahoma City which shows that Newcastle is listed separately. Newcastle is treated as a separate community by the local telephone companies.

8. Newcastle is also served by a local transportation system. Attached hereto as Exhibit 3 is a letter from Ms. Melissa McElderry, Transportation Director for the Delta Community Action Foundation, Inc. Ms. McElderry reports that Delta Public Transit is currently serving Newcastle and other communities in McClain County with transportation service including "regularly scheduled service for senior citizens centers for nutrition services, transportation to places of employment, transportation for the elderly and other persons who wish to use public transportation for social/recreational, medical, shopping, and demand response." The fact that a transportation system operates outside of Oklahoma City and provides service to Newcastle is further evidence that Newcastle is a separate community.

9. Diamond also argues that the studios and offices of noncommercial FM station KMSI(FM), Moore, Oklahoma, are located in Newcastle, and that this somehow

translates into first local service for Newcastle. However, the fact is that KMSI(FM) is licensed to Moore, not Newcastle, and Diamond has not cited a single case where the Commission equated the location of a station's studio or office in a community with the station providing "first local service" to that community.⁹ TBC's proposal will bring the first local radio service to Newcastle. None of Diamond's arguments compel a different conclusion.

Contingent Objection of Vera L. Dunn

10. Paragraph 9-10 of the NPRM permitted the licensee of KIMY to file by January 22, 1996, a written statement "showing with particularity why her license should not be modified as proposed in the *Order to Show Cause*." This procedure is set out in §1.87 of the Rules. The NPRM clearly warned Ms. Dunn that failure to file such a showing by the deadline would result in Dunn being "deemed to have consented to the proposed modification...." Instead of making the requisite showing, Vera L. Dunn filed a "Contingent Objection" which is procedurally defective and should be stricken from this proceeding. Because her Contingent Objection was filed pro se and not through an attorney, Ms. Dunn was required to file with her paper the verification required by Section 1.52 of the Rules. Section 1.52 requires that parties that are not represented by an attorney sign and verify the document and state their address. While Ms. Dunn's pleading includes the address of a Washington, D.C. law firm, the paper was not signed

⁹ Similarly, the fact that a local real estate office refers to KMSI as a "Newcastle" station appears to be nothing more than a realtor's attempt to make the community of Newcastle look more attractive to commercial and residential clients.

by an attorney and Ms. Dunn did not verify that the information contained in her pleading was accurate and correct. As such, the Commission should strike Ms. Dunn's Contingent Objection and give it no consideration. See, FM Table of Allotments (Latta, SC, et al.), 10 FCC Rcd 7204, n. 1 (1995); FM Table of Allotments (Flora and Kings, MS), 7 FCC Rcd 5477, n. 6 (1992); and FM Table of Allotments (Lake City, SC), 47 FCC 2d 1067 (1974).

11. Should the Commission consider Ms. Dunn's Contingent Objection, it should deny the relief she is seeking. She does not argue that the modification of KIMY's license should not be made on any technical or legal grounds. Rather, Ms. Dunn is seeking an exorbitant sum for voluntarily modifying her license. She contends that she and TBC have had discussions concerning the total figure for the costs associated with the channel change but that the difference between the parties figures is "unusually large." Without citing to a single Commission precedent, Ms. Dunn contends that the parties must decide on a final figure for reimbursement before the Commission can grant TBC's Petition for Rulemaking and order the modifications requested by TBC. This is not the law. The Commission has held that a rulemaking petitioner must agree to reimburse a licensee for the costs associated with a proposed channel change but the Commission does not require that the parties agree to a fixed amount before the Commission issues its decision or that monies be pre-paid before the Commission will grant a rulemaking decision. See, FM Table of Allotments (Circleville, Ohio), 8 FCC 2d 159, ¶ 12, where the Commission refused to rule on the exact amount of the expenses to be reimbursed,

finding that "it cannot now be determined what they will actually prove to be." TBC has acted reasonably and has agreed to reimburse Ms. Dunn for the reasonable and prudent costs associated with the KIMY channel change, which is all that the Commission requires in this case.

12. On July 21, 1995, KIMY estimated the move to Channel 230A would cost \$24,745.00 as itemized below:

Transmitter: Parts, labor, travel exp.	\$2,725.00
Retune antenna & related work, travel exp.	\$3,780.00
Downtime/lost rev./salaries	\$1,425.00
New jingle package	\$2,500.00
New logo	\$ 750.00
New ad specialty items/giveaways	\$1,840.00
Roadsigns/billboards	\$ 695.00
New promotional advertising campaign in weekly and daily newspapers in coverage area (2 months weekly basis/4 months EOW)	\$8,300.00
New newsletters, envelopes, pre-print forms, brochures, etc.	\$1,380.00
Some misc. costs (telephone, attorney, administrative)	<u>\$1,350.00</u>
TOTAL	\$24,745.00

13. TBC agreed to the reimbursement figure, and an agreement was drafted and sent to KIMY for signature. When TBC's principals did not promptly receive the signed agreement for KIMY, TBC inquired of KIMY and TBC was told that KIMY wanted \$117,000. It appears that KIMY is attempting to abuse the FCC's processes to obtain unwarranted compensation for its channel change. The Commission should reject KIMY's blatantly inappropriate attempted cash grab.

Conclusion

14. Neither Diamond nor Vera Dunn have shown any reason why TBC's proposed reallocation of Channel 227C1 from Ada to Newcastle, Oklahoma, should not be granted.

The arguments raised by Diamond are not supported by Commission precedent and are refuted by the record evidence in this case. Ms. Dunn's arguments are similarly flawed and unsupported. She failed to show cause why the license for KIMY should not be modified. TBC has shown that its proposal will serve the public interest by bringing first local service to Newcastle. Newcastle is a separate community that deserves its first broadcast service. TBC's proposal will not result in a loss of service to Ada and will provide a substantial net gain in areas and populations served. It would result in a preferential arrangement of allotments, and should be quickly granted.

WHEREFORE, Tyler Broadcasting Corporation respectfully requests that the Commission make the requested changes to the FM Table of Allotments, as follows:

Oklahoma

	<u>Present</u>	<u>Proposed</u>
Ada	227C1, 244A	244A
Newcastle	None	227C1
Watonga	228A	230A

TBC also requests the Commission substitute Channel 230A for Channel 228A at Watonga, Oklahoma, and modify Ms. Dunn's license for KIMY, Watonga, to operate on Channel 230A. Finally, TBC requests that the Commission modify the license of KTLS to operate on FM Channel 227C1 at Newcastle, Oklahoma. As previously stated, upon allotment of Channel 227C1 to Newcastle and the allotment becoming effective, TBC will promptly file with the FCC an application for construction permit or license, as directed,

to modify KTLS' license to operate as a Newcastle station and will take those steps necessary to operate KTLS on Channel 227C1 at Newcastle.

Respectfully submitted,

TYLER BROADCASTING CORPORATION

By: 

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February 13, 1996

DF\KTLS\REPLY.212

EXHIBIT 1

TECHNICAL EXHIBIT

**TECHNICAL STATEMENT
IN SUPPORT OF ASSIGNING CHANNEL 227C1**

**Newcastle, Oklahoma
February 1998**

This Technical Statement supports the Petition for Rulemaking to change the city of license for Channel 227C1 from Ada, Oklahoma to Newcastle, Oklahoma.

The proposed city of license is bounded on the northeast by the South Canadian River. We checked with the Newcastle City Hall and was assured that in no place does the city cross the river or go outside of McClain County. According to the 1990 US Census Maps¹ showing the Oklahoma City Urbanized Area there is no location where the Oklahoma City Urbanized Area crosses the South Canadian River. The South Canadian River is a major tributary in Oklahoma as this river bisects the entire state.

There is one small area (see enclosed Exhibit #1) where the Urbanized Area touches the north side of the River. This is the only location where the Oklahoma City Urbanized Area touches the north side of the river with the City of Newcastle on the south side of the river. The river is a natural boundary with only two bridges crossing the river in the Newcastle area. Interstate Highway-44 crosses in the north portion of the city and Interstate Highway-35 crosses at the southeast corner of the city. These two bridges are approximately 16 km apart. Both of these bridges are limited access interstate highway bridges. There are

¹ Census information from 1990 Oklahoma Census of Population and Housing (CPH-2-38). The map for Exhibit #1 & #2 is a portion of the map on page G-15 of this publication. The Exhibit #1 map has been enlarged for better detail.

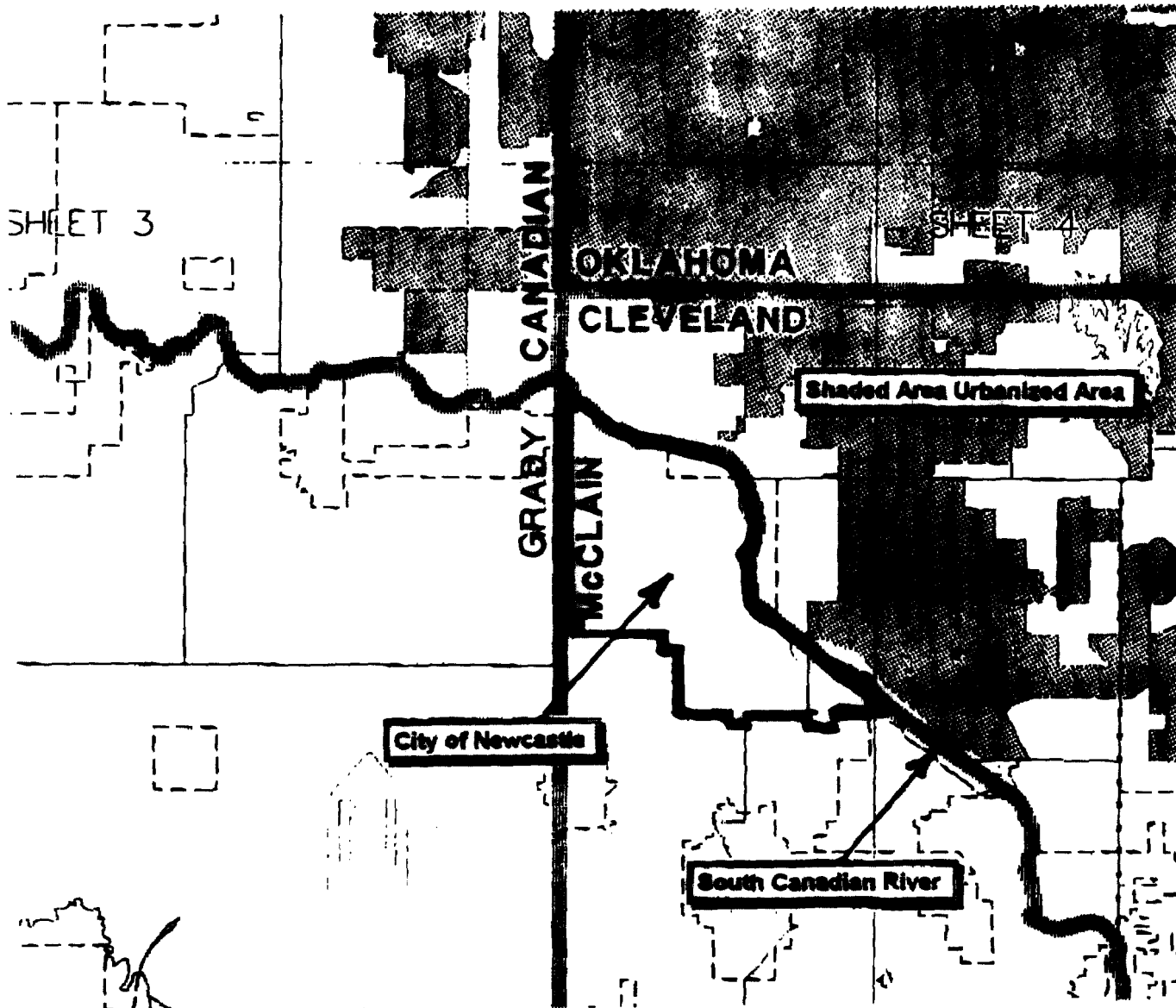
no other smaller non-limited access bridges which are normally found in contiguous urbanized or neighborhood type areas. Therefore, we find a very natural north/south boundary. Not only does the South Canadian River comprise a natural boundary it is also a political boundary between Cleveland County and McClain County. About 35% of Cleveland County on the north side of the river is inside the Oklahoma City Urbanized Area and none of McClain County on the south side of the river is in the Urbanized Area. Newcastle is in McClain County.

Exhibit #2 shows the US Census Map of the Oklahoma City Urbanized Area. This exhibit also shows the proposed 3.16 mV/m contour (assuming a maximum Class C1 facility) from the proposed allocation site for Channel 227C1. With the use of a Polar Planimeter we have determined that the city grade (3.16 mV/m) contour will cover 85% of the Oklahoma City Urbanized Area.

BROMO COMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "William G. Brown", is written over the company name.

William G. Brown

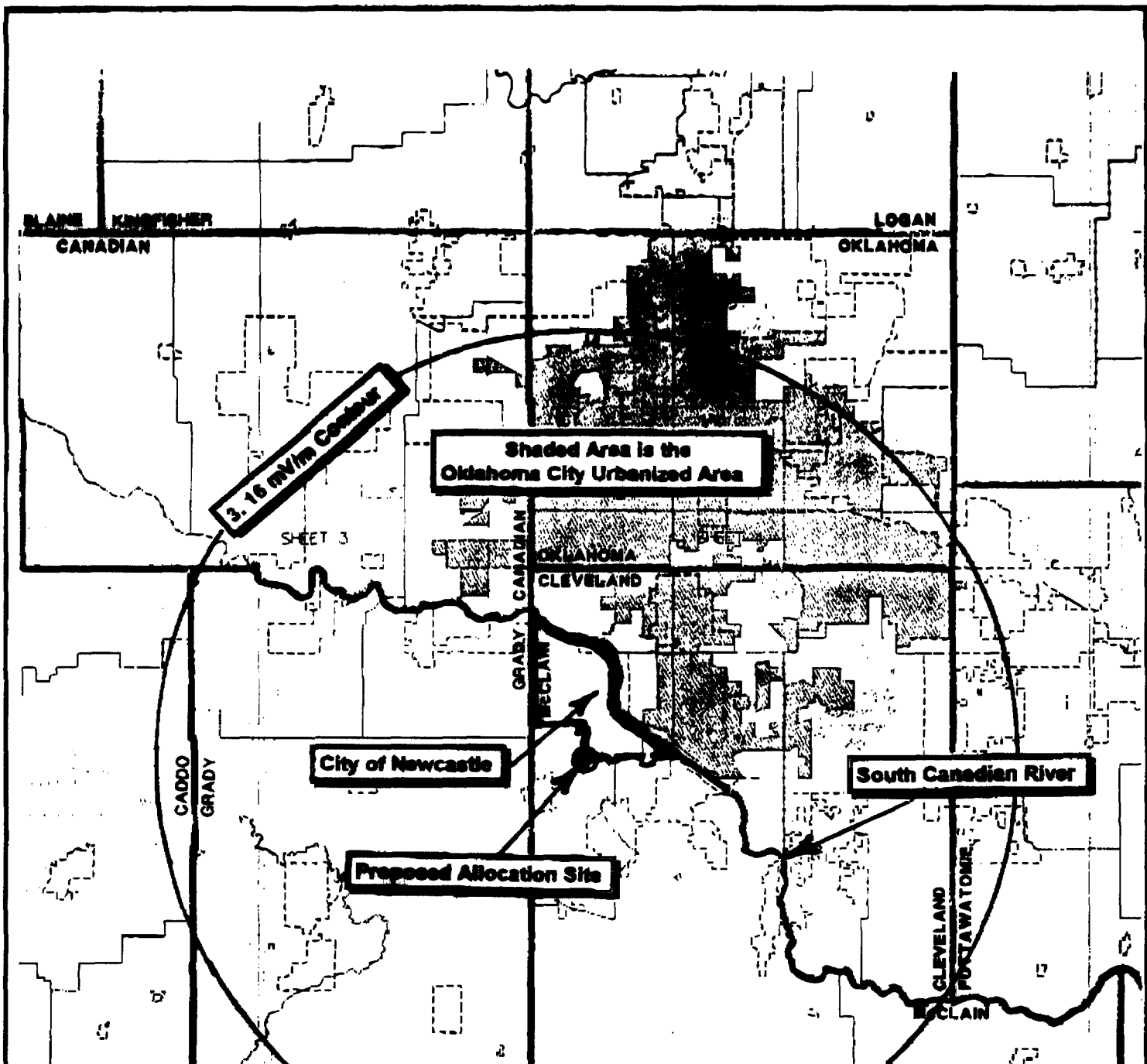


Newcastle & OKC Urbanized Area

Map is an expanded portion of the US Census Oklahoma City Urbanized Area

EXHIBIT #1
COMMENTS TO RULEMAKING
Assign Channel 227C1
 Newcastle, Oklahoma
 February 1996

TECHNO COMMUNICATIONS BROADCAST TECHNICAL CONSULTANTS



3.16 mV/m Coverage of Urbanized Area

3.16 mV/m contour covers 85% of Urbanized Area assuming a maximum Class C1 facility at the allocation reference point.
The map is a portion of the US Census Map Oklahoma City Urbanized Area.

EXHIBIT #2
COMMENTS TO RULEMAKING
Assign Channel 227C1
Newcastle, Oklahoma
February 1996

BERNARD
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS

EXHIBIT 2

PORTION OF SOUTHWESTERN BELL'S TELEPHONE DIRECTORY
FOR OKLAHOMA CITY AREA



Southwestern Bell

Oklahoma City Area

© Southwestern Bell Telephone Company 1995



TELEPHONE DIRECTORY

NEWCASTLE, OKLAHOMA

WHITE PAGES

A

Better Deal Salvage
21 Sleepy Hollow Tuttle 392-2313
Clean Sweep
County Line Rd Nwctl 392-2972
bitt Ronnie Lee
821 Ranchwood Dr Nwctl 387-4695
bott D R Bichrd 387-9200
bott Steve
11 Bichrd 392-2188
el T Darrin & Sheila
17 SW 24th Nwctl 387-2435
ernathy Alton Bichrd 392-5659
ernathy James R
11 Bichrd 392-4597
ney Audine
240 NW 32nd Nwctl 392-5638
ston Jim
305 Redbud Ln Nwctl 392-3777
ord Sherman D Nwctl 392-4436
ams Danny
2000 NW 22nd Nwctl 387-4657
ams Mike R
4 of City Bichrd 392-3833
erman Steven & Sandra
Quail Haven Bichrd 387-2529
ie D Nwctl 387-3044
ie's Poodle Shop
2244 S Lakeview Dr Nwctl 387-5600
er Larry M Rt 2 Tuttle 392-3382
ey Renita A
Tri City Mbl Hm Pk Nwctl 387-2723
ins Bill
Marty Ln Nwctl 387-9536
bers Rodney B
2813 Hwy 130 Nwctl 387-3886
brecht Donald
Rt 1 Bichrd 392-4364
britton Ernie
Quail Haven Bichrd 387-4344
bridge L D
Southern Hills Bichrd 387-3417
exander Dan
1908 Oak Hollow Dr Nwctl 387-6014
exander Kerry L
Rt 1 Nwctl 387-2216
exander Michael & Connie
Sycamore Mbl Hm Pk Nwctl 392-2033
leman Robert & Ann
Tuttle 392-5010
len B M Nwctl 387-2866
len Michael A
1405 Airport Dr Nwctl 392-5526
len Stanley
2401 SW 16th Nwctl 387-2545
len William H
Rt 5 Bichrd 392-4437

ALLSTATE INSURANCE COMPANIES

Snowhill Ind Pk Tuttle 392-2390
Imquist Dave Rt 5 Bichrd 392-3210
merican Cowhorse Record
2320 E Fox Ln Nwctl 387-5670

Anders Dale E
3240 SW 6th Nwctl 392-3817
Anders Steven
1709 Hickory Ln Nwctl 387-3110
Anderson B Rt 1 Tuttle 387-9230
Anderson Boyd
1917 Hillcrest Circle Nwctl 387-2184
Anderson Don
1615 Ward Dr Nwctl 392-4533
Anderson Gary
3240 N Council Nwctl 392-2295
Anderson Harold C
Rt 1 Bichrd 392-4963
Anderson Kenneth E
Rt 1 Nwctl 392-4713
Anderson Robert C
Rt 4 Bichrd 392-5554
Anderson Russell
1213 N Doris Ave Nwctl 387-5459
Anderson Terry G
114 Harryman Nwctl 387-4528
Andrews Dale C
Rt 3 Tuttle 392-5097
Anglin Brandi Norman 387-5778
Anglin J M
2934 SW 6th Nwctl 392-4880
Anglin Linda M
Rt 1 Norman 387-2006
Anglin T R Rt 1 Nwctl 387-5545
Anglin Travis
409 SW 27th Pl Nwctl 387-2242
Anthony Lloyd Glenn
4605 SW 174 Nwctl 387-2514
Apollo Chimney Sweep
Rt 4 Bichrd 392-2292
Appliance Unlimited
Nwctl 387-2773
Appling Troy L
Rt 3 Tuttle 392-2883
Armentrout A J Nwctl 392-2399
Armentrout Max Nwctl 392-2398
Armstrong R W Nwctl 387-2109
Arterbery Stephanie
Nwctl 387-2448
Askins M L Nwctl 387-3182
Aspell Harry Jr
2025 SW 7th Nwctl 387-4945
Atkinson C K Rt 4 Bichrd 392-2233
Atkinson Richard L
Rt 2 Nwctl 392-4962
Atkinson Schales
1208 Red Bud Ln Nwctl 392-3146
Atteberry Darrell B
24 N Walker Nwctl 387-4447
Autry David L Rt 1 Nwctl 392-4627
Avance B C
1709 Cottonwood Ln Nwctl 387-4757
Aztec Nails & Tanning Etc
3605 NW 32nd Nwctl 392-2717

B

B J's Automotive Centers & Repair
3755 NW 32nd Nwctl 392-2000

B & R ASPHALT PAVING & TRUCKING INC

1500 N Main Nwctl 387-9382
Or 387-9384
Fax 387-2969

Babb Ray K Jr Atty
Corp Cntr Nwctl 387-5297
Res Nwctl 392-4931
Babb Steve & Monica
2703 NW 31st Nwctl 392-3227
Babin Albert
1805 S Sequoyah Ln Nwctl 392-4598
Bagley Terry L
222 SE 22nd Nwctl 387-9775
Bahajak Patrick G
39 Quail Haven Bichrd 387-3442
Bailey Bob Rt 1 Bichrd 392-4952
Bailey Janie Rt 1 Tuttle 387-2074
Bailey Lori K Rt 4 Bichrd 392-3706
Bain Bill Quail Haven Bichrd 387-3053
Baker Brent
17000 62 Hwy Nwctl 387-3636
Baker Charles W
Rt 5 Bichrd 392-4478
Baker Garland C
Rt 2 Tuttle 392-4338
Baker Glenn Nwctl 392-4553
Baker Joseph G
Rt 4 Bichrd 392-4894
Baker Judee Nwctl 387-9796
Baker Keith Rt 2 Tuttle 392-5402
Baker Melvis
2228 Doris Ave Nwctl 387-4454
Baker Michael Ray
1305 N Doris Ave Nwctl 387-5795
Baker Neal Nwctl 392-4947
Baker Sandy Nwctl 387-2931
Baker Scott E
1012 Buckingham Nwctl 387-3873
Baker Tommy
1101 Wilshire Dr Nwctl 387-9388
Baldischwiller John L
3033 Willow Dr Nwctl 392-3223
Baldwin Larry D
1021 Carr Dr Nwctl 387-5522
Baldwin Tom
1113 N Carr Nwctl 387-5612
Bales Dayton
1113 Whispering Ln Nwctl 392-4686
Ball Michael Rt 3 Tuttle 392-2225
Ballard Charles H
Rt 1 Bichrd 392-4333
Barbour Dane
3418 SW 16th Nwctl 387-4966
Bare David Rt 3 Tuttle 392-2144
Barker Fred & Kathy
Twn Crks Bichrd 387-2336
Barker Warren Nwctl 392-5478
Barksdale Earnest O
1608 N Lisa Ln Nwctl 392-4429
Barnes Marvin
1005 SW 24th Nwctl 387-2064
Barrett Donald
Rt 4 Bichrd 392-3167
Barrett William D
Rt 2 Tuttle 392-3279

Barton A
2508 NW 30th Nwctl 392-2403
Barton Hoyt
17505 S Meridian Nwctl 387-5773
Barton James A
1845 Hwy 130 Nwctl 387-4437
Basinger D
818 SW 16th Nwctl 387-3214
Basler Jerry D
Rt 1 Bichrd 387-3849
Basler Kevin D Bichrd 387-2908
Basler Marion D
Rt 1 Bichrd 387-2698
Bass C E
2525 S May Nwctl 387-4417
Bass E M Rt 1 Norman 387-4406
Bass Jerry Don
Rt 1 Norman 387-4705
Bateman Bill J
Twin Crk Bichrd 387-9462
Bateman Leon
Whipporwill Estates Nwctl 387-4694
Bateman Tracy L Nwctl 387-4339
Bates Robert T
609 NW 16th Nwctl 387-5604
Bates Tommy
1001 Eunice Nwctl 387-5290
Batson Michael O
W of City Nwctl 392-5085
Baughman Pearl Nwctl 387-5744
Bean Bobby J
201 N Country Club Rd Nwctl 387-5701
Bean David
201 N Country Club Rd Nwctl 387-2591
Bean Kenneth Q Sr
Rt 1 Bichrd 387-3119
Bean Sarah Nwctl 387-6087
Beard Chuck Bichrd 387-3686
Beard John L
1004 Wilshire Dr Nwctl 387-5752
Beard William L & Kristal
Rt 5 Bichrd 392-3260
Beasley Raina
2032 SW 7th Nwctl 387-9813
Beasley Ron & Sharon
3833 NW 24th Nwctl 392-4727
Beaty Willard E
901 N Rockwell Nwctl 387-4644
Bedell D Bichrd 392-9610
Beese R Nwctl 392-3132
Beese Rodney
2301 Oak Hollow Dr Nwctl 387-4480
Beets John
208 Ridgecrest Tuttle 392-4943
Begley Jimmy R
Country Mbl Hm Pk Nwctl 392-2138
Begue Glenn Bichrd 392-3716
Belco-Nathan's
Bridge Creek Bichrd 387-2282
Belew Gary B
Oak Forrest Nwctl 387-2338
Or 387-2485
Belew Wesley
Rt 1 Bichrd 387-9569
Belinski L M
77 Quail Haven Bichrd 387-3159
Bell H Lloyd Bichrd 387-2062

EXHIBIT 3

LETTER FROM MELISSA MCELDERRY
TRANSPORTATION DIRECTOR FOR DELTA
COMMUNITY ACTION FOUNDATION, INC.